



{In Archive} Comments on Draft RI
Victor Ketellapper to: Nicole Bein

02/16/2010 04:33 PM

History: This message has been replied to.

Archive: This message is being viewed in an archive.

Attached. Not many comments. Good summary of the project.



Libby OU4 DraftRI.VK.doc

Victor Ketellapper, P.E.
USEPA
1595 Wynkoop St. (8EPR-SR)
Denver, CO 80202

(303)312-6578

Comments on the Draft OU-4 Remedial Investigation Report

1. Update figures to show current boundaries developed by EPA
2. Prepare a summary table of the number of properties addressed by the different removal action protocols
3. Include a summary table of the property investigations (Total # of Properties, # investigated, # that meet current removal action cleanup criteria, # of properties that LA found at > .2%, # where property investigation was not completed....)
4. Contents for Sections 2.2 and 2.3 change title to "Phase _ Investigation"
5. Section 1 Introduction – Add a sentence that this RI will be amended periodically until the feasibility study is started.
6. Section 1.2 Site Background, 3rd Paragraph. "The other processing Plant (known today as the former Export Plant), was located near downtown Libby near *the intersection of Kootenai River and Highway 37*
7. Section 1.2 Site Background, 4th Paragraph. Change "Grace completed reclamation" to "Grace reclaimed"
8. Section 1.3, Regulatory History. Why is the September 24, 2008 amendment not included in Appendix A?
9. Section 1.4, Operable Unit 4 Site Boundary. Make this discussion specific to OU4. I see there could be some confusion with this language since LA has been transported through environmental mechanisms at OU3. Also, I recommend deleting the reference to the transport of waste by people to Yaak, Eureka, and Kalispell.
10. Section 2.4.1, Soil. Please include a table that describes the Bin classification system.
11. Section 2.17 Remediation Status. Include a sentence discussing that the data in the RI will be used in the FS to evaluate cleanup alternatives.
12. Section 2.20.2.2. The title of this section does not make sense to me. Should this section be titled "Building Demolition".
13. Section 2.20.5. Include a total number of properties on the Table. Also, should we clarify here why the total project property cleanups differ from the OU4 property cleanups?
14. Libby High school. 1st Paragraph. Was LA detection based on PLM-VE?
15. Section 2.21.2 5th paragraph. Where did the sand pails come from? Need background on why sand pails are an important issue.
16. Section 3.2.3. Please identify the animals that are found in packs at the site.